

### **REMARKS/ARGUMENTS**

Prior to entry of this amendment, claims 1, 2, 5-22, 25-33 and 36-43 were pending in this application. Claim 1 has been amended, no claims have been added, and no claims have been canceled herein. Therefore, claims 1, 2, 5-22, 25-33 and 36-43 remain pending. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

#### **35 U.S.C. §101 Rejection, Non-statutory matter**

The Office Action has rejected claims 1, 2 and 5-21 under 35 U.S.C. §101 because the claimed invention is allegedly directed to non-statutory matter. While the Applicants respectfully traverse the rejection for at least the reasons stated previously, amendments have been made to claim 1, upon which claims 2 and 5-21 depend, for the sake of expediency. These amendments present no new matter, do not necessitate a new search, and are made to only formal matters. Furthermore, these amendments are thought to overcome the reasons for rejection. Therefore, the Applicant's respectfully request entry of the amendment and withdrawal of the rejection.

#### **35 U.S.C. § 103(a) Rejection, Madan in view of Pinard**

The Office Action rejected claims 1, 2, 5, 8-15, 17-22, 25-33 and 36-43 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,748,374 of Madan et al. (hereinafter "Madan") in view of U.S. Patent No. 5,940,834 of Pinard et al. (hereinafter "Pinard"). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or

combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP §706.02(j). As will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. For example, the cited references do not teach or suggest, alone or in combination, removing auxiliary classes that are superior to a first auxiliary class.

Madan "is directed to the storage and access of object-oriented entities within a relational database management system." (Col. 1, lines 13-15) More specifically, Madan "is directed to the representation and storage of directory information objects, such as LDAP directory data, in a relational database system" and "the generation of a database query language statement to query or manipulate directory information objects in a relational database." (Col. 4, lines 30-32 and 33-35) Madan discloses methods for defining, modifying, and deleting attribute types (Col. 13, line 16 - col. 14, line 38) and defining, modifying object classes (Col. 14, line 39 - col. 16, line 2). However, Madan explicitly states that "a superior class can not be removed." (Col. 15, lines 34-35)

Pinard relates to "web page generator for automatic generation of web pages in Internet and Intranet environments." (Col. 1, lines 5-7) Under Pinard, a "web page directory is created from data stored in the directory application component of the web page generator and after being placed on a web server, allows any individual who has network access to the web server offering the web page to view the directory information in a web page format." (Col. 1, lines 54-59) That is, Pinard teaches generating a web page to display directory information stored in a database. More specifically, FIG. 2 of Pinard and the accompanying description (col. 4, line 28 - col. 5, line 10) describes "deleting an item class." However, Pinard does not teach or suggest removing auxiliary classes that are superior to a first auxiliary class. Rather, Pinard describes deleting only a selected item or class and is completely silent on removing anything other than the selected class.

In response to these arguments, the Office Action points to col. 5, lines 11-16 which recites in whole:

"If at step 202, the administrator chose to delete a class of items, the administrator is then prompted to provide the name of a class of items to delete (step 210). At step 212, when the administrator has entered the name of the class of items to delete, the program removes that class of items, and the database table relating to that class of items.

and col. 6, lines 51-67 which recites in whole:

"Returning to step 210 of the flow chart in FIG. 3, if the administrator chooses to delete an item, the choice must then be made regarding which item should be deleted as illustrated at step 256. In this example, the administrator chooses to delete an employee. At step 258, the administrator must choose which specific employee to delete. This is further illustrated on the "DELETE EMPLOYEE" screen 304 of FIG. 4b. Employee name 310 is displayed on the screen and the administrator types in the name of the specific employee 315 to be deleted from the data base and from the web pages. Once the specific employee 315 had been entered, that record is removed from the data base as illustrated at step 260 of FIG. 3. At step 270, the parent web page must then be regenerated so that the specific employee that has been deleted does not appear on the parent web page. The web page generator program then proceeds to steps 280 and 299 as described above.

However, neither of these passages makes any suggestion to remove anything other than the selected class. Thus, neither reference, alone or in combination, teaches or suggests removing auxiliary classes that are superior to a first auxiliary class.

The Office Action also argues that the motivation to combine the teachings of Madan and Pinard is "to remove unwanted class of items and the database tables related to that class of items, thereby preventing to removing class to appear on the parent web page."

However, such an alleged motivation falls short since Pinard by itself prevents the removed class from being displayed on the web page after the web page is regenerated thus negating any motivation to combine Pinard with another reference to achieve these results. Again, even if combined, the cited portions of Pinard fail to address the shortcomings of the combination of

Madan and Pinard. Namely, neither reference, alone or in combination, teaches or suggests removing auxiliary classes that are superior to a first auxiliary class.

Claim 1, upon which claims 2, and 5-21 depend, claim 22, upon which claims 25-32 depend, and claim 33, upon which claims 36-43 depend, each recite in part "removing a subset of said first set of attributes from said entry after said step of creating said first entry wherein removing the subset of said first set of attributes comprises removing a first auxiliary class of one or more auxiliary classes associated with said subset of said first set of attributes and removing auxiliary classes that are superior to said first auxiliary class and that are not superior to any auxiliary classes that remain part of said entry." Neither Madan nor Pinard, alone or in combination, teaches or suggests removing auxiliary classes that are superior to a first auxiliary class. Rather, Pinard teaches removing only a selected item and is completely silent on removing superior items or classes while Madan explicitly states that "a superior class can not be removed." For at least these reasons, claims 1, 2, 5, 8-15 and 17-22, 25-33, and 36-43 should be allowed.

**35 U.S.C. § 103(a) Rejection, Madan in view of Pinard and Desgranges**

The Office Action has rejected claims 6, 7 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Madan in view of Pinard and further in view of U.S. Patent No. 6,751,797 of Desgranges et al. (hereinafter "Desgranges"). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. More specifically, the references cited by the Office Action do not teach or suggest each claimed limitation. For example, the cited references do not teach or suggest, alone or in combination, removing auxiliary classes that are superior to a first auxiliary class. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

As discussed above, the combination of Madan and Pinard does not teach or suggest removing auxiliary classes that are superior to a first auxiliary class. Rather, Pinard

teaches removing only a selected item and is completely silent on removing superior items or classes while Madan explicit states that "a superior class can not be removed."

Desgranges is directed to "a method for managing the persistence of EJB [Enterprise Java Beans] components integrated into an EJB server of a computer system. (Col. 1, lines 45-47) The method "consists of managing persistence in a directory accessed via LDAP by mapping and adapting an entity EJB component to a given type of LDAP entry in a given directory." (Col. 1, lines 48-51) Desgranges discloses methods for creating, modifying and deleting these LDAP enties but does not teach or suggest removing auxiliary classes that are superior to a first auxiliary class.

Therefore, none of the references, alone or in combination, teach or suggest removing auxiliary classes that are superior to a first auxiliary class. For at least these reasons, claims 6, 7 and 16 should be allowed.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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